

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO

CASE No.: 5:11-cv-00666-SL

LARRY GIVENS and TRINA MITCHELL, on behalf
of themselves and all others similarly situated,

Plaintiffs,

v.

VAN DEVERE, INC.,

Defendant.

FILED
CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
APR 15 2011

2011 APR 15 AM 11:27

MOTION FOR ADMISSION *PRO HAC VICE*

Pursuant to N.D. Ohio Civ. R. 83.5(h), Raymond G. Ingalsbe hereby moves the court to admit him *pro hac vice* to appear and participate as co-counsel in this case for plaintiffs and class representatives, Larry Givens and Trina Mitchell.

1. The undersigned is an attorney licensed to practice law in the State of Florida and is seeking permission to co-counsel for plaintiffs, LARRY GIVENS and TRINA MITCHELL, on behalf of themselves and all others similarly situated, in this case. This motion seeks permission to appear in this case and for no other purpose.

2. The undersigned represents that he is a member in good standing of the highest court of Florida as attested by the accompanying certificate from that court and that Raymond G. Ingalsbe is not eligible to become a member of the permanent bar of this Court. This Motion is accompanied by the required \$100.00 fee.

3. The undersigned is in good standing with and eligible to practice before, the

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4/15/11

following courts:

<u>Title of Court</u>	<u>Date of Admission</u>
Florida Supreme Court	1976
All Florida State courts	1976
Southern District of Florida (Federal)	1983
Middle District of Florida (Federal)	1977
United States Eleventh Circuit Court of Appeals	1984

4. The undersigned was suspended for ten days 2001 as a result of a fee dispute with a client in the case of *Stephenson v. Holiday Rambler Corporation*, Case No.: CL-93-10507AO, Palm Beach County Circuit Court. After the trial court entered a judgment for the plaintiff in the amount of \$5,000, the court awarded attorney's fees to the undersigned in an amount of \$35,000. The client claimed that he and I had verbally agreed that half of any fee award would be paid to him. I refused his demand. He brought a bar complaint which was ultimately set for trial in another county. I chose to follow my attorney's advice to accept the Florida Bar's settlement offer of a 10-day suspension instead of trying the case to a jury.

5. The undersigned will be co-counsel with Thomas D. Robenalt (Ohio Bar #0055960) and Allen Tittle (Ohio Bar #0086590) of the law firm of Novak Robenalt & Pavlik, LLP, located at Tower City Center, Skylight Office Tower - Suite 950, 1660 West Second Street, Cleveland, Ohio 44113-1498, telephone number: (216) 781-8700, fax number (216) 781-9227.

6. The undersigned is not a resident of, nor regularly employed, engaged in business, or professional or other activities in the State of Ohio.

7. Thomas D. Robenalt and Allen Tittle of the law firm of Novak Robenalt & Pavlik, LLP, are members of the Ohio Bar, are the attorneys with whom the court and opposing counsel may

continue to communicate regarding the conduct of this case, and upon whom papers may be served.

The undersigned requests that he receive copies of all correspondence and court filings.

8. Raymond G. Ingalsbe understands that, unless expressly excused, he must register for electronic filing with this Court promptly upon the granting to this motion.

Raymond G. Ingalsbe's relevant identifying information is as follows:

Business telephone: (561) 775-3505 Business Fax: (561) 624-3533

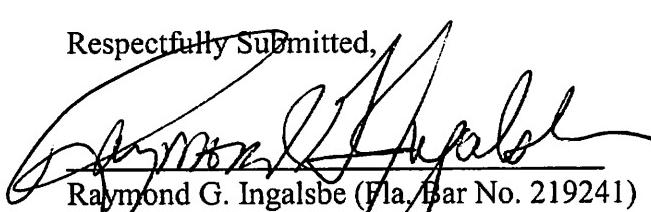
Business address: 4400 PGA Boulevard, Suite 800

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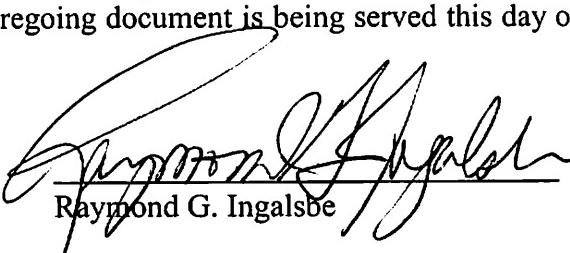
Dated: April 14, 2011
Palm Beach Gardens, Florida

Respectfully Submitted,


Raymond G. Ingalsbe (Fla. Bar No. 219241)
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CERTIFICATE OF SERVICE

I hereby certify that on April 14, 2011 the foregoing document was sent to the Clerk of the Court using U.S. Mail. I also certify that the foregoing document is being served this day on all counsel of record via email and U.S. Mail.


Raymond G. Ingalsbe

SERVICE LIST

Givens v. Van DeVere, Inc.

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United States District Court, Northern District of Ohio

Thomas D. Robenalt (Ohio Bar #0055960)

Allen Tittle (Ohio Bar #0086590)

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